

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) Bankruptcy Case No. 23-21916-JCM
Marvin Arturo Galeas and)
Amber Anne Galeas,)
Debtors,) Chapter 13
_____)
)
Marvin Arturo Galeas and) Related to: Document No. 47
Amber Anne Galeas,)
Debtors,)
v.)
Forward Financing, LLC;)
American Builders & Contractors)
Supply, Co. Inc.; and Ronda J.)
Winnecour, Chapter 13 Trustee;)
Respondents.)

**STIPULATED CONSENT ORDER RESOLVING CONTESTED MATTER AS TO
FORWARD FINANCING LLC**

AND NOW, come the Movants, Marvin and Amber Galeas, and Respondent, Forward Financing, LLC, by and through their attorneys, stipulate and agree to the following order resolving the *MOTION TO (A) DETERMINE SECURED STATUS, (B) AVOID JUDICIAL LIEN, AND (C) DISALLOW, OR IN THE ALTERNATIVE, OBJECT TO CLAIM* (ECF No. 47) as to Respondent, Forward Financing LLC:

STIPULATIONS OF THE PARTIES

- A. Marvin and Amber Galeas (the "Debtors") filed a chapter 13 bankruptcy on September 11, 2023.
- B. As part of the Debtors' bankruptcy estate is the real property located at 3083 Countryside Drive, Allison Park, PA 15101.
- C. The Debtors asserted an exemption in the amount of \$55,800 pursuant to 11 U.S.C. § 522(d)(1).

D. The Debtors asserted that several liens encumber 3083 Countryside Drive, Allison Park, PA 15101.

E. Forward Financing LLC asserted a judicial lien in the amount of \$23,898.00 based on Proof of Claim No. 27.

F. The Parties have determined Forward Financing LLC's lien is unsecured.

G. In lieu of further litigation and to minimize costs and expenses, the Parties, upon the advice of counsel, have agreed to resolve the dispute regarding the secured status and exemption impaired of Forward Financing LLC's claim through this stipulated consent order.

CONSENT ORDER

It is hereby **ORDERED, ADJUDGED, and DECREED** as follows:

1. The Motion is **GRANTED** as set forth herein.
2. The Claim of **FORWARD FINANCING LLC** is an Allowed General Unsecured Claim in the amount set forth in its Proof of Claim. Its Claim shall be treated as an unsecured claim to be paid at the same rate as all other unsecured claims in this case.
3. Upon the successful completion of the Debtors' Chapter 13 bankruptcy, the judicial lien of **FORWARD FINANCING LLC** shall be stripped off from 3083 Countryside Drive, Allison Park, PA 15101.
4. **FORWARD FINANCING LLC** shall not be compelled to record a copy of this Order in any appropriate offices and/or dockets. However, the Debtors retain the right to file a Certified Copy of this Order in all appropriate offices and dockets, including but not limited to, the Court of Common Pleas of Allegheny County, Pennsylvania and the

United States District Court for the Western District of Pennsylvania to reflect to the release of the judicial lien.

5. Any and all claims against **Forward Financing LLC** under Chapter 5 of the Bankruptcy Code are waived and released.

6. The Bankruptcy Court shall retain jurisdiction over the interpretation and enforcement of this Order.

CONSENTED TO BY:

On behalf of the Debtors
Marvin Arturo and Amber Anne
Galeas

/s/ Andrew K. Pratt
Andrew K. Pratt, Esq.
PA ID. No. 328784

On behalf of Creditor
Forward Financing LLC

/s/ Walter Weir, Jr.
Walter Weir, Jr., Esq.
PA ID No.23137

Dated: March 8, 2024

By the Court,

A handwritten signature in black ink, appearing to read 'John C. Melaragno', is written over a horizontal line. The signature is stylized with a large 'J' and 'M'.

gib

John C. Melaragno, Judge
United States Bankruptcy Court

SIGNED
3/8/24 9:55 am
CLERK
U.S. BANKRUPTCY
COURT - WDPA

In re:
Marvin Arturo Galeas
Amber Anne Galeas
Debtors

Case No. 23-21916-JCM
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0315-2
Date Rcvd: Mar 08, 2024

User: auto
Form ID: pdf900

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Mar 10, 2024:

Recip ID	Recipient Name and Address
db/jdb	+ Marvin Arturo Galeas, Amber Anne Galeas, 3083 Countryside Drive, Allison Park, PA 15101-3933

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Mar 10, 2024

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on March 8, 2024 at the address(es) listed below:

Name	Email Address
Andrew Kevin Pratt	on behalf of Debtor Marvin Arturo Galeas apratt@c-vlaw.com kmosur@c-vlaw.com;ssimmons@c-vlaw.com;jadam@c-vlaw.com;eballa@c-vlaw.com;mlocke@c-vlaw.com;akpratt.ecf@outlook.com;ncalaiairo@c-vlaw.com;pgualtieri@c-vlaw.com
Andrew Kevin Pratt	on behalf of Joint Debtor Amber Anne Galeas apratt@c-vlaw.com kmosur@c-vlaw.com;ssimmons@c-vlaw.com;jadam@c-vlaw.com;eballa@c-vlaw.com;mlocke@c-vlaw.com;akpratt.ecf@outlook.com;ncalaiairo@c-vlaw.com;pgualtieri@c-vlaw.com
Denise Carlon	on behalf of Creditor PNC BANK NATIONAL ASSOCIATION dcarlon@kmlawgroup.com
Jeffrey Hunt	on behalf of Creditor Peoples Natural Gas Company LLC ecfpeoples@grblaw.com PNGbankruptcy@peoples-gas.com

District/off: 0315-2

User: auto

Page 2 of 2

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Form ID: pdf900

Total Noticed: 1

Jeffrey R. Hunt

on behalf of Creditor County of Allegheny jhunt@grblaw.com

Jeffrey R. Hunt

on behalf of Creditor Township of Shaler jhunt@grblaw.com

Keri P. Ebeck

on behalf of Creditor Duquesne Light Company kebeck@bernsteinlaw.com
btemple@bernsteinlaw.com;jdryer@bernsteinlaw.com;kebeck@ecf.courtdrive.com

Maribeth Thomas

on behalf of Creditor Bridgecrest Credit Company LLC as Servicer for Carvana, LLC mthomas@tuckerlaw.com,
maribeth.thomas@gmail.com

Office of the United States Trustee

ustpre03.pi.ecf@usdoj.gov

Ronda J. Winnecour

cmecf@chapter13trusteedpa.com

Scott Howard Bernstein

on behalf of Creditor American Builders & Contractors Supply Co. Inc. d/b/a ABC Supply Co., Inc. scott@scottbernsteinlaw.com

TOTAL: 11